

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

CHRISTIE ANDREWS,

Plaintiff,

v.

TRI STAR SPORTS AND  
ENTERTAINMENT GROUP, INC.

Defendant.

Civil No. 3:21-cv-00526

Judge Eli J. Richardson

Magistrate Judge Jefferey S. Frensley

**PLAINTIFF'S [OPPOSED] RENEWED MOTION FOR LEAVE TO FILE  
ADDITIONAL PAGES IN OPPOSITION TO TRISTAR'S DISPOSITIVE MOTION**

Because this Court denied without prejudiced her original motion and direct Plaintiff to the absence of grounds justifying the request. Plaintiff respectfully renews her motion for leave to additional ten pages in opposition to TriStar's Dispositive Motion, but this time provide the basis for requesting the additional pages. Plaintiff filed a brief that is 31 pages. Plaintiff requested the additional pages in this particular case to: (1) address each of Defendant's argument under the three definitions of disability; (2) provide arguments direct and indirect theories of proof; (3) address the modified prima facie standard in the context of a reduction in force; (4) and provide the court with necessary factual background; and (5) set out Plaintiff's disparate impact theory of liability. Plaintiff does not believe this will unduly prejudice given that Defendant is allotted 30 pages in seeking summary judgment and this motion is seeking similar number of pages to respond.

Respectfully submitted,



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Daniel Arciniegas

ARCINIEGAS LAW

**CERTIFICATE OF SERVICE**

I hereby certify that on Tuesday, December 13, 2022, I electronically served the foregoing PLAINTIFF'S [OPPOSED] RENEWED MOTION FOR LEAVE TO FILE ADDITIONAL PAGES IN OPPOSITION TO TRISTAR'S DISPOSITIVE MOTION via CM/ECF:

Tara L. Swafford, BPR # 17577  
Thomas Anthony Swafford, BPR #  
17578Elizabeth G. Hart, BPR # 030070  
The Swafford Law Firm, PLLC  
207 Third Avenue North  
Franklin, Tennessee 37064  
Tel: (615) 599-8406  
Fax: (615) 807-2355  
[Tara@swaffordlawfirm.com](mailto:Tara@swaffordlawfirm.com)  
[Tony@swaffordlawfirm.com](mailto:Tony@swaffordlawfirm.com)  
[Betsy@swaffordlawfirm.com](mailto:Betsy@swaffordlawfirm.com)

Attorneys for Tri Star Sports and  
EntertainmentGroup, Inc.

Respectfully submitted,



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Daniel Arciniegas, BPR #35853  
**ARCINIEGAS LAW**  
1242 Old Hillsboro Road  
The Atrium Building  
Franklin, Tennessee 37069  
T. 629.777.5339  
[Daniel@AttorneyDaniel.com](mailto:Daniel@AttorneyDaniel.com)